# UNITED STATES OF AMERICA BEFORE THE NATIONAL LABOR RELATIONS BOARD REGION 9

ABF FREIGHT SYSTEMS, INC.

and

Cases 09-CA-208379 09-CA-210267

GENERAL TRUCK DRIVERS, WAREHOUSEMEN, HELPERS, SALES AND SERVICE, AND CASINO EMPLOYEES AND INTERNATIONAL BROTHERHOOD OF TEAMSTERS (IBT), LOCAL 957

# GENERAL COUNSEL'S MOTION FOR AN EXTENSION TO FILE A SUPPLEMENTAL BRIEF PURSUANT TO THE BOARD'S INVITATION TO FILE BRIEFS

The General Counsel, through the undersigned, hereby files this request for an extension of time to file supplemental briefs in response to the Board's October 31, 2019, invitation to file briefs in these cases.

On December 12, 2019, the Board, upon request by the General Counsel and Charging Party, granted a 30-day extension to file briefs in these cases. Accordingly, the Board set January 15, 2020 as the due date for filing of supplemental briefs. Following the Board's grant of an extension to file supplemental briefs, the brief writer representing the General Counsel in these cases underwent an emergency medical procedure that caused a multi-week absence from his work. Consequently, the undersigned respectfully requests an additional extension for filing of supplemental briefs due to the unforeseen medical emergency. Charging Party and Respondent's respective positions on this extension request were solicited, however, as of the filing of this request, neither party had yet responded.

For the foregoing reasons, the undersigned respectfully requests that the Board grant an additional 14-day extension for the filing of briefs responsive to the Board's Notice and Invitation to File Briefs.

Dated: January 9, 2020

Respectfully submitted,

### /s/ Daniel A. Goode

Daniel A. Goode Counsel for the General Counsel Region 9, National Labor Relations Board Room 3003, John Weld Peck Federal Building 550 Main Street Cincinnati, Ohio 45202-3271

#### **CERTIFICATE OF SERVICE**

January 9, 2020

I hereby certify that I served General Counsel's Motion for an Extension to File a Supplemental Brief Pursuant to the Board's Invitation to File Briefs by electronic mail to the following parties:

Mark Theodore, Attorney Proskauer Rose LLP 2049 Century Park East, Suite 3200 Los Angeles, CA 90067-3206 Email: mtheodore@proskauer.com

Sophia Alonso Esq. Proskauer Rose LLP Eleven Times Square New York, NY 10036-8299 Email: salonso@proskauer.com

John R. Doll Esq.
Doll, Jansen, Ford
111 W First St., Suite 1100
Dayton, OH 45402-1156
Email: jdoll@djflawfirm.com

### /s/ Daniel A. Goode

Daniel A. Goode Counsel for the General Counsel Region 9, National Labor Relations Board Room 3003, John Weld Peck Federal Building 550 Main Street Cincinnati, Ohio 45202-3271